REGION: 04 STATE: GA

6.

### U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE C E R C L I S V 1.2

PAGE: 9 RUN DATE: 12/27/85 RUN TIME: 17:48:44

#### M.2 - SITE MAINTENANCE FORM

	* ACTION: _	/ <u>/</u>
EPA ID : GAD000608166		· ·
SITE NAME: GILBERT & BENNETT MFG INC CORP SOURCE: H	•	
STREET : MEADOWBROOK INDUSTRIAL PARK CONG DIST: 09	*	
CITY: TOCCOA ZIP: 30577 *		
CNTY NAME: STEPHENS CNTY CODE : 257	*	<u></u>
LATITUDE : 34/34/42.0 LONGITUDE : 083/19/18.0	* _/_/	//*
LL-SOURCE: G LL-ACCURACY:	* =	_
SMSA : HYDRO UNIT: 00000000	*	*
INVENTORY IND: Y REMEDIAL IND: Y REMOVAL IND: N FED FAC IND: N	*	- *
NPL IND: N NPL LISTING DATE: NPL DELISTING DATE:	•//-	*
SITE/SPILL IDS:	*	*
RPM NAME: RPM PHONE:	•	
SITE CLASSIFICATION: SITE APPROACH:	* —	<del></del>
DIOXIN TIER: REG FLD1: REG FLD2:	•	<u> </u>
RESP TERM: PENDING ( ) NO FURTHER ACTION ( )	* PENDING (_) NO FURTHER	ACTION (_) *
ENF DISP: NO VIABLE RESP PARTY ( ) VOLUNTARY RESPONSE ( ) COST RECOVERY ( )	* = =	***************************************
SITE DESCRIPTION:		do se per un pro <del>minio de des</del>
	*	
	*	1 1
	•	*

5323

REGION: 04 STATE : GA

#### U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE C E R C L I S V 1.2

PAGE: 10 RUN DATE: 12/27/85 RUN TIME: 17:48:44

M.2 - PROGRAM MAINTENANCE FORM

	* ACTION: _
ITE: GILBERT & BENNETT MFG INC CORP	
PA ID: GADOOG608166 PROGRAM CODE: HO1 PROGRAM TYPE:	<u>-</u> •
ROGRAM QUALIFIER: ALIAS LINK :	* <del>_</del> _
ROGRAM NAME: SITE EVALUATION	
ESCRIPTION:	
	en e

REGION: 04 STATE: GA

## U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE C E R C L I S V 1.2

PAGE: 11 RUN DATE: 12/27/85 RUN TIME: 17:48:44

#### M.2 - EVENT MAINTENANCE FORM

			* ACTION: _		
SITE: GILBE Program: Site	RT & BENNETT MFG INC CORP EVALUATION				
EPA ID: GADOO	0608166 PROGRAM CODE: H01	EVENT TYPE: DS1		•	
FMS CODE:	EVENT QUALIFIER :	EVENT LEAD: E	• _		
EVENT NAME:	DISCOVERY	STATUS:	*		_
DESCRIPTION:				1	
			*		
			*		
			*		
			*		
ORIGINAL	CURRENT	ACTUAL			
START:	START:	START:	· _/_/_	_/_/_	
COMP :	COMP :	COMP : 08/01/80	* _/_/_	_/_/_	_/_/_
HQ COMMENT:					
			*	<u> </u>	
RG COMMENT:					
			*		
COOP AGR #	AMENDMENT # STATUS	STATE %			
		0			

REGION: 04 STATE: GA CONT.

#### U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE C E R C L I S V 1.2

PAGE: 12 RUN DATE: 12/27/85 RUN TIME: 17:48:44

#### M.2 - EVENT MAINTENANCE FORM

			* ACTION: _		
SITE: GILBE PROGRAM: SITE	RT & BENNETT MFG INC CORP EVALUATION				
EPA ID: GADOO	0608166 PROGRAM CODE: H01	EVENT TYPE: PAI			
FMS CODE:	EVENT QUALIFIER :	EVENT LEAD: \$	* -		
EVENT NAME:	PRELIMINARY ASSESSMENT	STATUS:	*		-
DESCRIPTION:					
			*		
			*	<del></del>	
			*		<del></del>
			*		<del></del>
ORIGINAL	CURRENT	ACTUAL			
START:	START:	START: 06/10/85	*//	_/_/_	_/_/_
COMP :	COMP :	COMP : 12/10/85	* _/_/_	//	_/_/_
HQ COMMENT:					
			*		
RG COMMENT:					
			*		
COOP AGR #	AMENDMENT # STATUS	STATE X			
		0	*		

REGION: 04 STATE : GA U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE C E R C L I S V 1.2 PAGE: 13 RUN DATE: 12/27/85 RUN TIME: 17:48:44

M.2 - COMMENT MAINTENANCE FORM

SITE: GILBERT & BENNETT MFG INC CORP

EPA ID: GAD000608166

COM

NO COMMENT

001 PART A- ON FILE

ACTION

. . .

. .

....

# PRELIMINARY ASSESSMENT COVER SHEET GILBERT & BENNETT MFG INC., CORP. GADOOO608166

The Gilbert & Bennett Manufacturing Company began operation in early 1982. The facility manufactures wire fence by descaling, drawing, galvanizing and welding 1/4 inch steel rods. Spent pickle liquor (K062) is generated during renewal of an HCl bath in the galvanizing porcess. This waste flows into a fiberglass tank in a separate building and a liquid caustic is added to increase the pH. The pickle liquor is then discharged into the municipal sewer system. Approximately two or three fifty-five gallon drums of solid descaling waste are generated each week and transported to the Stephens County Landfill. EP toxicity test data submitted by the company indicates that the solid scale-waste is non-hazardous.

No impoundments exist on site and no spills or unregulated releases are known to have occured.

The site is located in a sparsely populated rural area about 3 miles southeast of Toccoa, Georgia and 1/4 mile southwest of Eastanollee Creek.

The RCRA Part A permit application for the facility has been withdrawn. Pickle liquor waste generated by the plant is rendered non-hazardous before being released into the local sewer system. Solid descaling waste generated on site is non-hazardous. For these reasons the site is assessed a "none" priority for a Site Inspection.

CSW/mcw038

2	F	PΔ	L
V			٠

# POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENT	IFICATION
	02 SITE NUMBER
GA	D000608166

PART 1 - SITE INFORMA	HUN AF	ID WOOESOW	IEN I	
II. SITE NAME AND LOCATION				
01 SITE NAME (Legal, common, or descriptive name of site)	E (Legal, common, or descriptive name of site)  02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER			
Gilbert & Bennett Mfg. Inc., Corp.	P. 0	. Box 12	05, Route 145	
03 CITY		05 ZIP CODE	06 COUNTY	07 COUNTY 06 CONG CODE DIST
Toccoa	GA	30577	Stephens	257 09
09 COORDINATES LATITUDE LONGITUDE		<del>'</del>	<u> </u>	. 1
34° 31' 53.0" 083° 17' 37.5"	1			
10 DIRECTIONS TO SITE (Starting from nearest public road)	<u> </u>		······································	
From intersection of Buena Vista Drive	and H	wy. 145	(3 mi. SE of Toccoa	) proceed
southeast on Hwy. 145 for 1,000 feet.				
highway.				
III. RESPONSIBLE PARTIES				
01 OWNER (# known)	02 STREE	T (Business, malling,	reaktential)	
Gilbert & Bennett Mfg. Company	D	() Roy	1205	i
03 CITY	04 STATE	0. Box 05 ZIP CODE	06 TELEPHONE NUMBER	
Toccoa	GA	30577	(404) 886-1447	
07 OPERATOR (If known and different from owner)		T (Business, melling,	residential)	
				Ì
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER	
13 TYPE OF OWNERSHIP (Check one)	<u> </u>	L		
A. PRIVATE   B. FEDERAL:		_ C. STAT	TE D.COUNTY DE. MUNK	CIPAL
(Agency name)		_ 🗆 G. UNK	NOWN	ì
(Specify)  14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)				
	ED WAST	E SITE (CERCLA 14	23 c) DATE RECEIVED: MONTH DAY	
		- STILL DENGLATO	MONTH DAY	YEAR
IV. CHARACTERIZATION OF POTENTIAL HAZARD				
01 ON SITE INSPECTION BY (Check all that apply)  DATE: 12, 20, 22	CONTRA	CTOR √	C. STATE D. OTHER CO	NTRACTOR
□ XYES DATE 12 30 83 □ A. EPA □ B. EPA		F. OTHER:		
Mark Smith CONTRACTOR NAME(S):			(Specify)	·
02 SITE STATUS (Check one) 03 YEARS OF OPER		1	· · · · ·	
X) A. ACTIVE   B. INACTIVE   C. UNKNOWN	1982	Cont	inuing 🗆 UNKNOWN	·
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED				
Spent pickle liquor from steel finishin	g ope	rations	(K062)	
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION				
None - the spent pickle liquor at the f	acili	ty is ne	utralized (nH adius	tment) and
discharged into the local sewer system.				
hazardous wastes on site.			, ====, ==== 01	
V. PRIORITY ASSESSMENT		<del></del>		
01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Weste Infor	mation and Pa	rt 3 - Description of He XD, D, NON		
(Inspection required promptly) (Inspection required) (Inspect on time	evalläble bask		NE. rither action needed, complete current disposition	(torm)
VI. INFORMATION AVAILABLE FROM				
01 CONTACT 02 OF (Agency: Organize	etion)		03	TELEPHONE NUMBER
Grant Preble - Plant Manager Gilbert &	Ronn	ott Mfa	Company	404 886-1447
04 PERSON RESPONSIBLE FOR ASSESSMENT / 05 AGENCY		WIZATION		404 000-144/
Steve Walker /// DNR	FDU	-RAU	404 1656-7404	05 08 85
DIVE HUINEI AND DIVE	LEFU	- 1040	1404 000-7404	MONTH DAY YEAR

J. Suvirie

9	FI	$D\Delta$

#### POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA D000608166

<b>7/L</b>			PART 2 - WASTI	E INFORMATION		LGA DUUUG	00100
II. WASTES	TATES, QUANTITIES, AN	ID CHARACTER	ISTICS			··· <u>···</u>	
DX A. SOLID L. B. POWDE L. C. SLUDGI	E I.J G. GAS	TONS _ CUBIC YARDS _	f waste quantities independent)	☐ A. TOXIC ☐ B. CORRO ☐ C. RADIOA ☐ D. PERSIS	CTIVE U G. FLAMI	BLE [] I. HIGHLY \ TIOUS [] J. EXPLOS MABLE [] K. REACTI	IVE VE PATIBLE
L) D. OTHER	(Specify)	NO. OF DRUMS	<u>3/wk (55 g</u> a	1)			
III. WASTE T	YPE						
CATEGORY	SUBSTANCE N	AME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS		
SLU	SLUDGE						
OLW	OILY WASTE	<del></del>					
SOL	SOLVENTS						
PSD	PESTICIDES						
occ	OTHER ORGANIC CH	IEMICALS					
IOC	INORGANIC CHEMIC	ALS	122,400	gal/day	neutralize	d pickle liqu	Jor (K062)
ACD	ACIDS				to POTW.		
BAS	BASES						
MES	HEAVY METALS		3	55 gal. dr		produced fro	<u>om descali</u>
IV. HAZARD	OUS SUBSTANCES (See A	Opendix for most frequent	lly cited CAS Numbers)	<b>_</b>	operation	· · · · · · · · · · · · · · · · · · ·	L OR MEASURE OF
01 CATEGORY	02 SUBSTANCE N	AME	03 CAS NUMBER	04 STORAGE/DIS		05 CONCENTRATION	06 MEASURE OF CONCENTRATION
MES	Mercury	· 	7439-97-6	County lan		5.2-0.0	ug/kg (EP
MES	Chromium		7440-47-3	County lan		< 0.01	mg/kg (EP
MES	Barium	·	7440-39-3	County lan		0.6 - 0.0	mg/kg (EP
IOC	neutralized p	<u>ickle liqu</u>	or 999	local sewe	r system	unknown	
V. FEEDSTO	CKS (See Appendix for CAS Number	Prs)					
CATEGORY	01 FEEDSTOC	K NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTO	OCK NAME	02 CAS NUMBER
FDS				FDS			
FDS				FDS			
FDS		· · · · · · · · · · · · · · · · · · ·		FDS			
FDS				FDS			
VI. SOURCE	S OF INFORMATION (Cite	specific references, e.g.,	state files, sample analysis, r	eports )			
Trip R	art A permit a Report by Mark : from Gilbert &	Smith date	d 1/4/84 -	attached.	16/84 - att	ached.	

**\$EPA** 

#### POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PRELIMINARY ASSESSMENT
T3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENT	TIFICATION
01 STATE	02 SITE NUMBER
GA	0000608166

	AZARDOUS CONDITIONS AND INCIDENT		
II. HAZARDOUS CONDITIONS AND INCIDENTS			
01 © A. GROUNDWATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	POTENTIAL	□ ALLEGED
01 DB. SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 ☐ OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	POTENTIAL	□ ALLEGED
01 □ C. CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED:	02 [] OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	□ POTENTIAL	□ ALLEGED
01 D. FIRE/EXPLOSIVE CONDITIONS 03 POPULATION POTENTIALLY AFFECTED:	02 [] OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	DOTENTIAL.	□ ALLEGED
01 ☐ E. DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED:	02 [] OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	D POTENTIAL.	C) ALLEGED
01 © F. CONTAMINATION OF SOIL 03 AREA POTENTIALLY AFFECTED:	02 □ OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	D POTENTIAL	C) ALLEGED
01 [] G. DRINKING WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 ( i OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	□ POTENTIAL	[] ALLEGED
01 D H. WORKER EXPOSURE/INJURY 03 WORKERS POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	□ POTENTIAL	[] ALLEGED
01 (31. POPULATION EXPOSURE/INJURY 03 POPULATION POTENTIALLY AFFECTED:	02 ( ) OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	☐ POTENTIAL	□ ALLEGED

**\$EPA** 

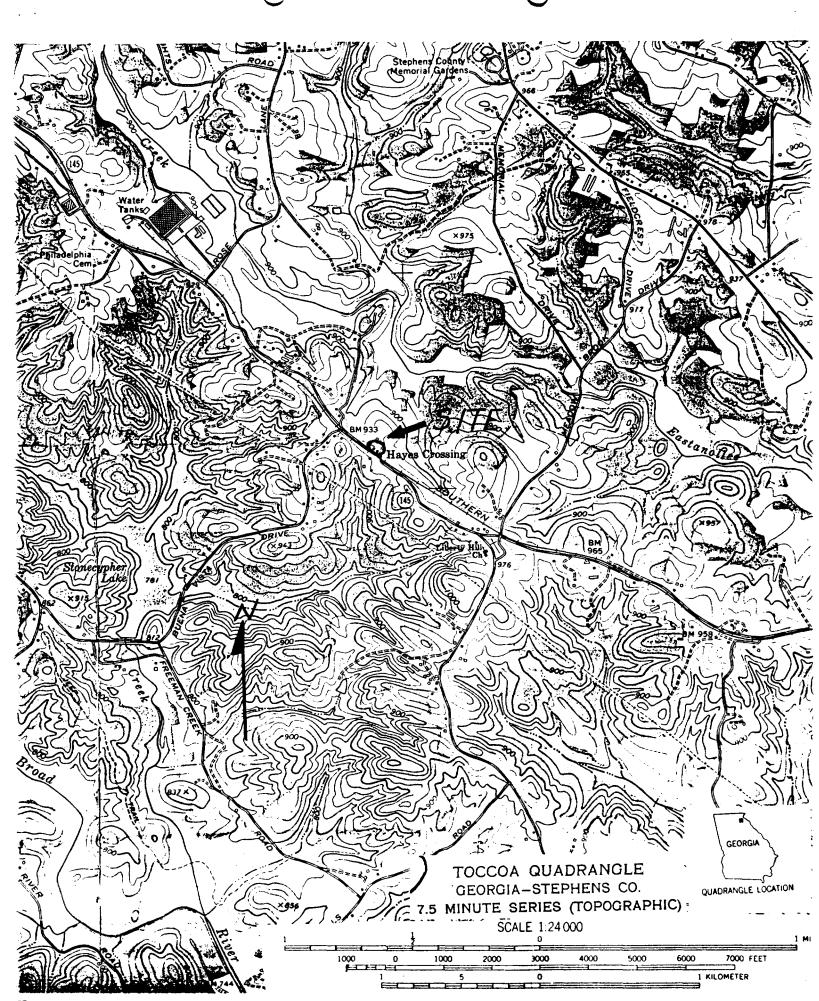
### POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

L IDENTIFICATION
01 STATE 02 SITE NUMBER
GA D000608166

PART 3 - DESCRIPTION OF HA	ZARDOUS CONDITIONS AND INCIDENTS	<u> </u>	00000100		
II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)					
01 □ J. DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION	02 🗆 OBSERVED (DATE:)	D POTENTIAL	□ ALLEGED		
01   K. DAMAGE TO FAUNA  O4 NARRATIVE DESCRIPTION (Include name(s) of species)	02 🗆 OBSERVED (DATE:)	D POTENTIAL	□ ALLEGED		
01 DL. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	D POTENTIAL	□ ALLEGED		
01   M. UNSTABLE CONTAINMENT OF WASTES (Spilts/runoff/standing liquids/lieaking drums)  03 POPULATION POTENTIALLY AFFECTED:	02 () OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	POTENTIAL	□ ALLEGED		
01   N. DAMAGE TO OFFSITE PROPERTY  O4 NARRATIVE DESCRIPTION	02 GOBSERVED (DATE:)	D POTENTIAL	□ ALLEGED		
01   O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs  O4 NARRATIVE DESCRIPTION	02 🗆 OBSERVED (DATE:)	☐ POTENTIAL	□ ALLEGED		
01 [] P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02 [] OBSERVED (DATE:)	[] POTENTIAL	□ ALLEGED		
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEG	SED HAZARDS				
III. TOTAL POPULATION POTENTIALLY AFFECTED:	one				
IV. COMMENTS					
All spent pickle liquor is neutralized (pH adjusted) prior to release into the local POTW.Solid descaling waste is non-hazardous (lab results attached) and is disposed of in the Stephens County Landfill at a rate of 3 drums per week.					
V. SOURCES OF INFORMATION (Cité specific references, e.g., state lifes, s	emple analysis, reports)	<del></del>			
Trip Report by Mark Smith dated 1/4, Letter from Gilbert & Bennett to Man		tached.			

## **POOR LEGIBILITY**

# PORTIONS OF THIS DOCUMENT MAY BE UNREADABLE, DUE TO THE QUALITY OF THE ORIGINAL





#### GILBERT & BENNETT

February 14, 1984

Department of Natural Resources Environmental Protection Division 270 Washington Street, S.W. Atlanta, GA 30334

FEB 22 1984

Attention:

Mr. J. Leonard Ledbetter

Division Director

ENVIRONMENTAL PROTECTION DIVISION LAND PROTECTION BRANCH

RE:

Gilbert & Bennett

Rt. 145 Liberty Hill Road

Toccoa, GA 30577 GAT 000 608 166

Grant Preble, Plant Manager

Regarding:

Hazardous Waste Activities

egetige to a contract of a contract of the con

Permit Applications

Dear Mr. Ledbetter:

GILBERT AND BENNETT, TOCCOA, GEORGIA, PROCESS DESCRIPTION

Gilbert & Bennett is a manufacturer of secondary operations of fabricated steel products. In our process we use hydrochloric acid to clean our steel wire. We generate spent pickle liquor from steel finishing operations. At this point, EPA lists this material as a hazardous substance identified as K062. Contained in our production process is a continuous chemical neutralization system.

After chemical neutralization the spent pickle liquor is no longer hazardous but is an industrial waste. This non-hazardous industrial waste water stream is then discharged into the town's sewer system. The facility is then regulated and inspected by the local sewer authority. We do not receive any wastes from off site.

Since November, 1980, our company has been complying with the regulations set forth in the Federal and State regulations outlined in the Code of Federal Regulations, Title 40, Part 260 - 265, Hazardous Waste Management System: General. It is the intent of our management to resubmit our application based upon the following statements:

1. We do not TREAT hazardous waste at this plant as noted in the above process description paragraph. There is no incineration, chemical treatment, physical treatment, removal of specific components or biological treatment performed at this plant therefore we formally request that we do not be classified as a "treatment" facility of hazardous waste.

#### GILBERT & BENNETT

- 2. We do not <u>STORE</u> hazardous waste at this plant for a period of more than 90 days in containers, tanks, waste piles or surface impoundments. The in line process tanks are not, in our opinion, to be considered hazardous waste storage facilities. We therefore formally request that we do not be classified as a "storage" facility of hazardous waste.
- 3. We do not <u>DISPOSE</u> of hazardous waste at this plant in land fill or any other means of disposal methods. Our waste streams are discharged into the regulated town sewer systems. We therefore formally request that we do not be classified as a "disposal" facility of hazardous waste.

Our facility management has elected not to operate as a TSD facility and therefore we are formally withdrawing our request ( Part B application) for a permit to operate a "Treat, Store, Disposal Facility".

We do, however, request that our facility in Toccoa, Georgia, be reclassified as an "Elementary Neutralization and Wastewater Treatment Unit". We further understand that we would, upon reclassification, be subject to 40 CFR, Part 266 (November 17, 1980 Federal Register) and any State of Georgia regulations that may apply.

This letter will be our formal notification to your office of our intentions. Should you have any questions concerning this matter or should you require additional information, please contact me at Georgetown or Grant Preble at our Toccoa facility.

Sincerely,

Ralph Sepanski

Manager of Engineering

Gilbert & Bennett Corporate Office

Ralph Seponski

Georgetown, CT 06829

(203) 544-8323

Approved\_

Caleb S. Taft
President
Gilbert & Bennett
Corporate Office

Georgetown, CT 06829

Calil A Inst

cc. Grant Preble
Gilbert & Bennett
Rt. 145 Liberty Hill Road
Toccoa, GA 30577
(404) 886-1447



JOE D. TANNER
Commissioner

### Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S.W ATLANTA, GEORGIA 30334

J. LEONARO LEDBETTER
Division Director

TRIP REPORT
January 4, 1984

Site Name & Location: Gilbert and Bennett

Route #145, Liberty Hill Road

Toccoa, Georgia 30577

Trip By: Mark Smith, EE MOS

Accompanied By: None

Date of Trip: December 30, 1983; 10:00 a.m.- Fair & Cold.

Officials Contacted: Grant Preble, Plant Manager

Grigg Shirley, Plant Electrician

Reference: None

Comments: The facility manufactures welded wire fence from ½-inch steel rod. Coils of this rod are first mechanically descaled, then drawn down to a specified guage. The resulting wire is then galvanized and fed into automated welding machines which manufacture the fence. The plant is a new facility which began manufacturing in 1982. They currently employ 40 full-time personnel operating three 8-hour shifts 5 days per week.

Spent pickle liquor (K062) is generated during renewal of a hydrochloric acid both in the galvanizing process. The spent solution flows to a separate building where pH adjustment occurs before discharge to a POTW. All storage and treatment occurs in fiberglass tanks. Automated pH monitors control the addition of liquid caustic and sound alarms should a malfunction occur. The treatment building provides secondary containment for any leak or overflow which might occur. The building is clearly marked with warning signs and kept locked when plant personnel are not present. Mr. Grigg Shirley is responsible for operating the treatment system. He provided a written description of inspection procedures and a log of equipment calibrations and miscellaneous comments. Although this documentation was considered to be acceptable, Mr. Preble was requested to revise the inspection schedule to more directly address the §266.13 regulations.

The descaling operation generates from two to three 55-gallon drums per week of solid waste which is currently being disposed of at the Stephens County landfill. An analysis of this material is attached. Mr. Preble was asked to perform the EP Toxicity test on this material to demonstrate that it is not hazardous by characteristic. Results are to be sent to this office within 3 months.

Že Two (2) rip Report-Gilbert & Bennett January 4, 1984

#### Conclusions:

- 1) The tank treatment unit listed in this facility's Part A application qualifies as a wastewater treatment unit and does not require a RCRA permit.
  - 2) The facility is in compliance with the applicable Part 266 regulations.

Recommendations and Follow-Up Required:

- 1) Receive request for Part A withdrawal.
- 2) Send compliance status letter.
- 3) Change facility status to generator.
- 4) Receive data on descaling waste to verify it is non-hazardous.

Photographs: None

Reviewed By: 40 114/84

Attachments: Analysis of descaling waste.

MS:djb:30

File: Gilbert & Bennett (R)



Client:

Gilbert and Bennett Manufacturing Company

Location:

Toccoa, Georgia

Date Sample Collected:

March 29, 1983

Date Completed:

April 4, 1983

Sample Identification:

Scale from Raw Material Descaling Operation

Analysis No.:

40705

Percent

Iron

75.1

Copper

0.06

Chromium

0.006

Manganese

0.26

Nickel

0.06

Malyst Basker

### GILBERT & BENNETT

February 16, 1984

FEB 201984

ENVIRONMENTAL PROTECTION DIVISION LAND PROTECTION BRANCH

Department of Natural Resources Enviornmental Protection Division 270 Washington Street, S.W. Atlanta, Georgia 30334

Attn: Mr. Mark Smith - Room #724

Dear Mark,

Enclosed please find J. E. Sirrine Company's test results on our iron rust scale. Please contact me if you have any further questions regarding this matter.

You should also be receiving a letter from Mr. Taft requesting that our Part A application be withdrawn.

Your helpful comments and suggestions during your visit were most welcome, and I appreciate the time you spent with us.

Sincerely,

Gilbert & Bennett Mfg. Co.

Grant Preble

GP/ch Encl. (2)

cc: Ralph Sepanski



February 14, 1984

Gilbert and Bennett Manufacturing Company Post Office Box 1205 Toccoa, Georgia 30577

Attention: Mr. Grant Preble

Subject: 1

Waste Analysis

Sirrine Job No. S-2250

Gentlemen:

Enclosed are two (2) copies of the analysis of the iron rust scale received January 9, 1984.

The scale was extracted per EPA regulations and the extract tested for the eight metals listed in the Hazardous Waste Criteria. All eight metals were found to be well within the limits allowed by the regulation.

Very truly yours,

J. E. SIRRINE COMPANY

W. T. Baskin

ji

cc: 612-Technical Services



February 14, 1984

Client:

Gilbert and Bennett Manufacturing Company

Address:

Toccoa, Georgia Sample Identification: Iron Rust Scale January 9, 1984

Dated Received: Date Completed:

February 14, 1984

The scale was extracted in accordance with EPA Hazardous Waste Regulations and the extract tested by EPA approved methods.

Parameter	Results
Arsenic	<0.01 mg/L
Barium	0.56 mg/L
Cadmium	<0.01 mg/L
Chromium	<0.01 mg/L
Lead	<0.01 mg/L
Mercury	5.23 ug/L
Selenium	<0.01 mg/L
Silver	<0.01 mg/l

All values are expressed as miligrams per liter except Mercury which is reported as micrograms per liter.

W. T. Baskin



JOE D. TANNER Commissioner

J. LEONARD LEDBETTER Division Director

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334

March 16, 1984 Gases Flower

Blown to US

Charge and the US

Charge and the US

Charge and the US

Mr. Grant Preble Gilbert & Bennett Mfg. Company Route 145, Liberty Hill Road Toccoa, Georgia 30577

RE: Request for Facility Status Change

Dear Mr. Preble:

This will acknowledge receipt of a request for withdrawal of your Hazardous Waste Facility permit application. Based on the information provided, withdrawal of your application is warranted and your permit application has been placed in our inactive files. Your status has -been changed to "generator only" and your EPA Identification Number has been retained.

As an operator of a Wastewater Treatment Unit, your facility is subject to Chapter 391-3-11-.10 (40CFR Part 266) of the Georgia Rules for Hazardous Waste Management. A recent inspection of your facility has indicated that you are in full compliance with these regulations. Future inspections will be conducted to ensure continued compliance.

If you have any questions concerning this or any matter related to hazardous wastes, feel free to contact Mark Smith at 404/656-7802.

Sincerely,

John D. Taylor.

Program Manager

Industrial & Hazardous Waste

Management Program

JDT:msb:13

File: Gilbert & Bennett (R) & (Y)

Al behave sixtes